



United States Department of the Interior

FISH AND WILDLIFE SERVICE

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Daphne, AL 36526

June 22, 1992

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Ms. Cheryl W. Smith
Remedial Project Manager
Environmental Protection Agency
345 Courtland Street, NE
Atlanta, GA 30365

Dear Ms. Smith:

We have reviewed the Preliminary Site Characterization summary of the Remedial Investigation/Feasibility Study (RI/FS) dated April 1992. The concerns listed below, which the Fish and Wildlife Service has expressed in numerous transmittals since January 1991 regarding the Olin McIntosh RI/FS work plan, have yet to be addressed.

This preliminary site characterization provides additional data, e.g. 2.2 ppm mercury in fish tissues, to further document mercury contamination in the Olin Basin. One of our main concerns continues to be the failure of the plan to incorporate the Tombigbee River into the sampling protocol. Since the hydrological link between the Olin basin and the Tombigbee River allows free access of fish and motile invertebrates, as well as littoral flow of sediments, into and out of the basin, it is crucial that the river be an integral part of the study. Our previous correspondence dated October 10, 1991, that commented on the revised Sampling and Analysis Plan (SAP), which indicated that the Department of Interior's position regarding a "covenant not to sue" cannot be completed until this area is addressed. That remains one position.

Another apparent deficiency in the RI/FS is the lack of chemical residue analyses on aquatic species intermediate in the food chain, as well as other food organisms such as crawfish, frogs, snakes, worms, etc. By analyzing the mercury content in largemouth bass and channel catfish an understanding of bioaccumulation in species at the top of the food chain, which are frequently consumed by humans and other organisms, can be made. However, as stated in previous correspondence dated October 10, 1991 and again on May 14, 1991 in order to determine bioavailability of mercury to trust resources such as migratory birds, anadromous fish, etc., data must be collected on mercury bioaccumulation in other organisms as well.

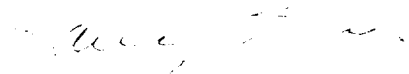
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The lack of control samples will inadequately describe the relative mercury concentrations in the study area. As was mentioned in the recommendations section of the Preliminary Natural Resource Survey prepared by this office in November 1986, additional sediment and biota samples should be taken in areas adjacent to, but not influenced by, the Olin facility.

It is the responsibility of the Fish and Wildlife Service to determine if the trust resources of the Department of the Interior have been damaged due to activities of the Olin Corporation at the McIntosh site. Without incorporating the above suggestions into the RI/FS, an adequate conclusion cannot be made.

Again, we appreciate the opportunity for these comments.

Sincerely,


Larry E. Goldman
Field Supervisor